



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 20 2014

Mr. Chris Ethridge  
Southeast Michigan District Supervisor  
Air Quality Division  
Michigan Department of Environmental Quality  
27700 Donald Court  
Warren, Michigan 48092-2793

REPLY TO THE ATTENTION OF

Dear Mr. Ethridge:

The U.S. Environmental Protection Agency has reviewed the draft renewal of the Renewable Operating Permit (ROP) for Precision Coatings, Inc., State Registration Number A5496, located in Walled Lake, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Staff Report, page 4. The stationary source emissions table only includes information pertaining to Volatile Organic Compounds (VOC) and total Hazardous Air Pollutants (HAP). Please provide additional information in the Staff Report regarding whether there are any other pollutants emitted, taking into account activities at the source, including but not limited to the three Regenerative Thermal Oxidizers (RTOs) and the four curing ovens.
2. Staff Report, page 5. The Staff Report states that the emission limitations for VOC from the four webcoating lines are exempt from the Part 64 Compliance Assurance Monitoring (CAM) requirements because "hazardous air pollutants which are part of VOC are addressed by Federal Regulations (CFR), Part 63, Subparts A and JJJJ." For units subject to both exempt and nonexempt emission limitations or standards, Part 64 still applies to the unit. On page 4 of the source's renewal application, the applicant also states that the source is subject to CAM. Please add the CAM permitting requirements specified in 40 CFR 64.6 through 64.9 to the permit as applicable, and revise the Staff Report accordingly.
3. Staff report, page 6. The Staff Report lists EU-EMERG-GEN as an exempt emission unit that is not subject to any applicable requirements. On pages 3-4 of the source's renewal application, the applicant states that the source is subject to the Reciprocating Internal Combustion Engine (RICE) Maximum Achievable Control Technology (MACT), 40 CFR Part 63, Subpart ZZZZ. The applicant also proposes permit conditions pertaining to the RICE MACT. Please add the RICE MACT requirements to the permit as applicable, and revise the Staff Report accordingly.
4. FG-WEBCOATING, SC I. Please include specific citations to the associated monitoring/testing methods in SC VI. for each emission limit, instead of a general reference to the entire section.

5. FG-WEBCOATING, SC I.2., SC I.3., and VI.4. Section VI.4. only includes a general statement regarding emission calculations for determining compliance with the VOC potential to emit limit and the HAP limit, and does not specify how emissions are to be calculated. Please include specific emission calculation requirements sufficient to assure compliance with the VOC and HAP emission limits, in accordance with the underlying applicable requirements (including 40 CFR 63.3360, 63.3370, R336.1205, 40 CFR 70.6(a)(3)(i)(B), and/or 70.6(c)(1), as applicable.

6. FG-WEBCOATING, SC I. The applicable emission standard in 40 CFR 63.3320 should be specified in the emission limit table. Further, footnote £ does not clearly address which 40 CFR Part 63.3370 compliance demonstration methods the source is using; i.e., is it as-purchased compliance coating materials, as-applied, multiple capture system and control devices, and/or combination of compliance coatings and control devices? In order to clearly delineate the source's compliance demonstration options and to ensure that all requirements are included in the permit, please include all applicable 40 CFR 63.3370 compliance demonstration methods directly in the permit, as well as all associated monitoring, recordkeeping, and reporting requirements for each of the methods.

7. FG-WEBCOATING, SC I.3. The underlying applicable requirements column cites a consent order. Is there a consent order currently in effect for this source? Please provide additional information in the Staff Report.

8. FG-WEBCOATING, SC III. and VI. These sections of the permit include some but not all of the operating limits and associated control equipment requirements for 40 CFR Part 63, Subpart JJJJ. For example, the permit includes some temperature monitoring requirements for the RTOs, but does not include the minimum MACT combustion temperature (and averaging time), or the requirements for establishing the minimum temperature. In addition, some of the requirements are paraphrased. Please revise the permit to specifically address the requirements in 40 CFR 63.3321, Table 1, 63.3350, and 63.3360 as applicable.

9. FG-WEBCOATING, SC V. This section of the permit includes testing/sampling methods for determining VOC content of the coatings, but it does not address HAP content requirements. Please include conditions for determining HAP content as necessary to assure compliance with the HAP emission limits, in accordance with 40 CFR 63.3360, 40 CFR 70.6(a)(3)(i)(B), and/or 70.6(c)(1), as applicable.

10. FG-WEBCOATING, SC VII. Please address the MACT semiannual compliance report requirements, as specified in 40 CFR 63.3400(c), in this section of the permit.

Thank you for the opportunity to provide comments on this draft permit. If you have any questions, please contact me or Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,



Genevieve Damico

Chief

Air Permits Section